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District of Nevada

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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

CATHERINE A. ORCUTT,

Plaintiff,

v.

ANDREW SAUL,  
Commissioner of Social Security,

Defendant.

Case No.: 2:19-cv-01920-DJA

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
(FIRST REQUEST)**

Defendant Andrew Saul, Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and Remand (Dkt. No. 24, filed on February 21, 2020), currently due on March 23, 2020, by 30 days, through and including April 22, 2020. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. No. 18) be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension due to Defendant's counsel's workload as described below. Since Plaintiff's motion was filed on February 21, 2020, Defendant's counsel has worked on approximately 17 district court cases, as well as a Ninth Circuit appeal. Counsel is also responsible for other substantive non-litigation matters in

1 the Office of General Counsel. The Office of General Counsel also currently has a number of  
2 attorneys out on leave of absence, in addition to staff attrition, which has increased the undersigned's  
3 workload at a time when the office is under a hiring freeze.

4 Additional time is required to review the record, to evaluate the numerous issues raised in  
5 Plaintiff's motion, to determine whether options exist for settlement, and if not, to prepare Defendant's  
6 response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as  
7 possible. This request is made in good faith and with no intention to unduly delay the proceedings,  
8 and counsel apologizes for any inconvenience.

9 On March 16, 2020, counsel for Defendant conferred with Plaintiff's counsel, who has no  
10 opposition to this motion.

11 It is therefore respectfully requested that Defendant be granted an extension of time to respond  
12 to Plaintiff's Motion for Reversal and Remand, through and including April 22, 2020.

13  
14 Dated: March 16, 2020

Respectfully submitted,

15 NICHOLAS A. TRUTANICH  
16 United States Attorney

17 /s/ Allison J. Cheung  
18 ALLISON J. CHEUNG  
19 Special Assistant United States Attorney

20  
21 IT IS SO ORDERED:

22   
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: March 20, 2020  
25 \_\_\_\_\_  
26

**CERTIFICATE OF SERVICE**

I, Allison J. Cheung, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** (*FIRST REQUEST*) on the date, and via the method of service, identified below:

**CM/ECF:**

Matthew McGarry  
[mmcgarry@windisability.com](mailto:mmcgarry@windisability.com)  
Attorney for Plaintiff

Hal Taylor  
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Attorney for Plaintiff

Dated: March 16, 2020

/s/ Allison J. Cheung  
ALLISON J. CHEUNG  
Special Assistant United States Attorney